

MANNING CURTIS BRADSHAW
& BEDNAR PLLC
David C. Castleberry, #11531
Mitch M. Longson, #15661
136 East South Temple, Suite 1300
Salt Lake City, Utah 84111
Telephone: (801) 363-5678
Facsimile: (801) 364-5678
dcastleberry@mc2b.com
mlongson@mc2b.com

Attorneys for Court-Appointed Receiver Wayne Klein

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

R. WAYNE KLEIN, as Receiver,

Plaintiff,
v.

JUSTIN D. HEIDEMAN LLC DBA
HEIDEMAN & ASSOCIATES, a Utah
limited liability company,

Defendant.

**STIPULATED MOTION TO EXTEND
EXPERT DISCOVERY**

**(Ancillary to Case No. 2:15-cv-00828)
(General Order 19-003)**

Civil No. 2:19-cv-00854-DN-PK

Magistrate Judge David Nuffer

Magistrate Judge Paul Kohler

Plaintiff R. Wayne Klein and Defendant Justin D. Heideman, LLC dba Heideman & Associates, LLC (together, the “Parties”), by and through their respective counsel of record, submit this *Stipulated Motion to Extend Expert Discovery* (the “Motion to Extend”) pursuant to Fed. R. Civ. P. 6(b)(1) and DUCivR 7-1(a)(2). The current deadline to conduct expert depositions is July

23, 2021. Because of the schedules of the expert witnesses and counsel involved in this case, the Parties were not able to set the depositions for two experts until August 3, 2021, and August 4, 2021. Therefore, the Parties respectfully request an additional eight business days to complete expert discovery in this case. All other deadlines established by the Court in the prior April 26, 2021 *Order Granting Motion to Extend Discovery & Associated Deadlines* (Dkt. No. 21) will remain unchanged. Pursuant to DUCivR 7-1(a)(2), a proposed order is attached hereto as Exhibit 1.

STIPULATED AND AGREED: July 7, 2021

MANNING CURTIS BRADSHAW & BEDNAR PLLC

/s/ David C. Castleberry
DAVID C. CASTLEBERRY

HEIDEMAN & ASSOCIATES

/s/ Justin Heideman **
JUSTIN HEIDEMAN
Attorney for Defendant Justin D. Heideman, LLC dba Heideman & Associates

**e-signature authorized via email

CERTIFICATE OF SERVICE

On July 7, 2021, I hereby certify that I caused a true and correct copy of the foregoing STIPULATED MOTION TO EXTEND EXPERT DISCOVERY to be served on the below parties via the method indicated below:

Party/Attorney	Method
JUSTIN D. HEIDEMAN JUSTIN R. ELSWICK 2696 North University Avenue, Suite180 Provo, Utah 84604 jheideman@heidlaw.com jelswick@heidlaw.com	<input type="checkbox"/> Hand Delivery <input type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Fax Transmission <input checked="" type="checkbox"/> Electronic Filing Notice

/s/ David C. Castleberry